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Attorneys for Defendant
Kan Pacific Saipan, Ltd.
dba Mariana Resort and Spa

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

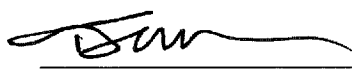
KOICHI TANIGUCHI,)	CIVIL CASE NO. 08-00008
)	
Plaintiff,)	NOTICE OF MOTION AND MOTION TO
)	COMPEL
vs.)	
)	
KAN PACIFIC SAIPAN, LTD. dba)	
Mariana Resort and Spa,)	
)	
Defendant.)	
)	

Please take notice that on _____, 2008, at the hour of _____m.,
defendant Kan Pacific Saipan, Ltd. shall move pursuant to FRCP 37(a)(1) for an order compelling
plaintiff Koichi Taniguchi to respond to a Request for Production, as more fully described in the
accompanying Declaration of Tim Roberts. This motion is based upon this notice of motion and
motion, the accompanying Memorandum of Points and Authorities, the accompanying Declaration

of Tim Roberts, all documents and pleadings on file in this action, and such further argument or evidence as may be presented at the hearing on this motion.

DOOLEY ROBERTS & FOWLER LLP

Date: 7.2.8

By: 
TIM ROBERTS, ESQ.
Attorneys for Defendant Kan Pacific Saipan,
Ltd. dba Mariana Resort and Spa